

Remarks/Arguments

This Amendment is in response to the Office Action mailed August 19, 2004. Claims 1 and 3-20 are pending in this case. Claims 1 and 3-20 have been rejected. Claim 5 has herein been amended for clarification purpose. Claims 1, 3, 4 and 6-20 remain unchanged.

Claims 1 and 3-20 have been rejected under 35 U.S.C. §103(a) as being unpatentable over Yura (US 6,327,373). For the following reasons, the Examiner's rejection is respectfully traversed.

A brief overview of Applicants' disclosed address learning method and system is again provided herein for ease of understanding. In one general embodiment, Applicant's method and system obtains address information, for example by scanning a mail piece. That address information is compared to information from a delivery point address database to determine the delivery point of the mail piece. Unused or unmatched information from the mail piece address information is sent to a first data base or storage. This information is then analyzed using selection criteria and is prioritized for further analysis. The unmatched data is then further analyzed, according to priority, to determine the type of data (e.g., person's name, street name, or city, etc.) and is then associated as an alias record with the corresponding data type in the corresponding delivery point address. This alias record is then sent to a data

base or storage. The alias records in this data base or storage are further analyzed using promotion criteria to determine whether and when the delivery point address data should be updated with the alias records. Upon meeting threshold criteria, the alias record is updated to an alias table for the corresponding delivery point address data.

Yura clearly does not make obvious Applicants' claims. Yura discloses a mail address reading apparatus and mail sorting apparatus which is used solely to determine the solution of the specific destination of a mail piece. The apparatus of Yura first locates and reads the zip code of a mail piece, and then locates and reads the addressee name. If a single destination solution can be determined from the zip code and the addressee name, then the procedure for determining the destination of the mail piece ends, and the mail piece is sorted accordingly.

If after reading the zip code and the addressee name, multiple destination solutions are still possible, then the apparatus locates and reads the address on the mail piece. If a single solution can be determined from the zip code, the addressee name, and the address, then the procedure for determining the destination of the mail piece ends, and the mail piece is sorted accordingly.

Similarly, if a zip code cannot be located or read, then the apparatus locates and reads the addressee name and the address. If a single solution can be determined from the addressee name and the address, then the procedure for determining the destination of the mail piece ends, and the mail piece is sorted accordingly.

Accordingly, Yura indicates that it is possible to provide a mail address reading apparatus and a mail sorting apparatus, which can reliably read the address, even if a character portion, such as a zip code, a street number, etc. is difficult to recognize. See, e.g., Yura's Brief Summary of the Invention, Column 1 line 50 to Column 2, line 39.

Yura simply does not relate to learning a delivery point address corresponding to unmatched or unused data, and then selectively updating a database of such delivery point addresses using the unmatched or unused data upon meeting threshold criteria, as does Applicants' method and system. Yura does not separate and correlate unmatched or unused data according to a set of predetermined rules, and in fact does not use unmatched or unused data in any way. Further, Yura is not concerned with and does not update a delivery point address database, but simply sorts mail pieces once a single destination solution is determined. Accordingly, Yura unequivocally fails to make obvious Applicants' Claims 1 and 3-20.

Specifically, with respect to Claims 1, 3 and 4, Yura fails to disclose the steps of separating the matched or used data from the unmatched or unused data, correlating the unmatched or unused data to a second set of preexisting data, and updating a delivery point address database with the unmatched or unused data. Yura simply does not teach, suggest or disclose these steps or any steps even remotely similar to these steps. With respect to Claim 4, as Yura does not disclose the claimed correlation step, Yura does not use a search engine to perform this step.

With respect to Claims 5-7, Yura fails to disclose a system for learning a delivery point address and updating a database of such delivery point addresses using unmatched data; means for separating matched data from unmatched data; a database comprising the unmatched data; means for correlating the unmatched data according to a plurality of predetermined rules; a rules database comprising the plurality of predetermined rules; and a learning database comprising information used to determine the delivery point of a subsequent mail piece. Again, Yura simply does not teach, suggest or disclose these elements or any elements even remotely similar to these elements. With respect to Claim 7, as Yura does not disclose the claimed means for correlating, Yura does not disclose means for correlating comprising a search engine.

With respect to Claim 8, Yura fails to disclose a method of associating unmatched address data with preexisting delivery point address data, comprising the steps of identifying unmatched address data which differs from the preexisting delivery point address data, analyzing the unmatched data, and associating the unmatched data with the pre-existing delivery point address data. Yura does not make any use of unmatched or unused data.

With respect to Claim 9, Yura fails to teach the step of updating the preexisting delivery point address data with the unmatched data when the unmatched data meets criteria for promotion.

With respect to Claims 10-12, Yura fails to obtain address data and compare it with pre-existing delivery point address data for the function of identifying unmatched data. Further, Yura fails to obtain address data from the Internet for this function, as in Applicants' Claim 12.

With respect to Claim 13, Yura fails to teach the step of analyzing the unmatched data, and that any such step comprises identifying a data type for the unmatched data, and identifying the corresponding data for that data type in the pre-existing delivery point address data.

With respect to Claim 14, Yura fails to teach the step of associating the unmatched data, and that any such step comprises

creating an alias record correlating the unmatched data to corresponding data in the preexisting delivery point address data.

With respect to Claim 15, Yura fails to teach the step of updating the preexisting delivery point address data, and that any such step comprises adding an alias record to a corresponding alias table associated with the preexisting delivery point address data.

With respect to Claim 16, Yura fails to teach criteria for promotion, and that any such criteria includes a threshold number of uses of the alias record.

With respect to Claim 17, Yura fails to teach the step of updating the preexisting delivery point address data, and that any such step comprises adding a new delivery point address to the preexisting delivery point address data in the event that the unmatched data does not correspond to an existing delivery point address.

With respect to Claim 18, Yura fails to teach the step of selectively removing from the preexisting delivery point address data the unmatched data when the unmatched data meets criteria for demotion.

With respect to Claim 19, Yura fails to teach the step of prioritizing the unmatched data according to selection criteria prior to analyzing the unmatched data.

With respect to Claim 20, Yura fails to teach a system for associating unmatched address data with preexisting delivery point address data, the system comprising means for identifying unmatched address data which differs from the preexisting delivery point address data, means for analyzing the unmatched data, means for associating the unmatched data with the pre-existing delivery point address data, and means for updating the preexisting delivery point address data with the unmatched data when the unmatched data meets criteria for promotion.

For the above reasons, Applicants respectfully submit that Yura fails to make obvious Applicants' Claims 1 and 3-20 as set forth herein, and that those claims are allowable over the cited prior art. It is respectfully requested that the Examiner reconsider and remove the above stated rejection, which can only be made in hindsight of Applicants' claims.

Again, Yura is only concerned with matching known mail piece data to existing data to determine a single destination solution, and then sorting that mail piece according to that single destination solution and nothing more. There is no reference to the use of unmatched or unused data in Yura. Unlike Yura, Applicants' method and system essentially functions after a delivery point address has been determined for a mail piece. Once a delivery point address has

been determined, Applicants' method and system, goes back to the mail piece data, determines what data was a match or was used to determine the delivery point address and what data was unmatched or not used. This unmatched and unused data is analyzed, prioritized, correlated with the delivery point address data, and then stored in a database until threshold criteria is met, at which time it is used to update the delivery point address database. This is completely and fundamentally different than the function, purpose, operation and structure of the apparatus of Yura.

It is respectfully submitted that none of the prior art of record, either alone or in combination, fairly teaches, suggests or discloses the novel and unobvious features of Applicants' claims. Accordingly, Applicants respectfully assert that the claims as presented herein are now in condition for allowance. An early notice allowance is respectfully requested.

Any arguments of the Examiner not specifically addressed should not be deemed admitted, conceded, waived, or acquiesced by Applicants. Any additional or outstanding matters the Examiner may have are respectfully requested to be disposed of by telephoning the undersigned.

A Petition for an Extension of Time and a Notice of Appeal are enclosed, along with a form PTO-2038 authorizing a credit card charge to cover the extension fee and notice of appeal fee.

The Commissioner is hereby authorized to charge any additional fees which may be required, including if necessary the above fees if there is any problem with the credit card charge or the amount, to Deposit Account No. 16-0657.

A postcard is enclosed evidencing receipt of the same.

Respectfully submitted,

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